

AMS 1,5

**Washington Department of Ecology  
Hazardous Waste & Toxics Reduction Program  
Compliance Report**

---

<b>Site:</b>	<b>All American Metal Finishing</b>	<b>RCRA ID#:WAD 981 772 114</b>
Inspection Date:	February 5, 2004	
Site Contacts:	Dave Amlin	
Phone:	253.854.2170	FAX:
Site Location:	1819 S. Central Ave Bay #37 Kent, WA 98032	
At This Site Since:	1996	NAIC#: 3471
Generator/Site Status:	LQG	

---

**Ecology**

Lead Contact:	Lisa Perle	Phone: 360.407.755	FAX: 360.407.6715
Other Representatives:	Ty Thomas, Martin Werner		
Report Date:	February 26, 2004		
Report By:	Lisa Perle		

\_\_\_\_\_  
(Signed)

\_\_\_\_\_  
(Date)

Facility Background:

The purpose of this inspection was to document compliance with Chapter 173-303 WAC, the Dangerous Waste Regulations. There was a compliance inspection at this facility in 1994. All American Metal Finishing is a LQG (large quantity generator) based on the 2003 annual report. They are a commercial zinc plater who has many clients (machine shops, fabrication shops, sheet metal shops) including Genie Industries. The waste streams listed under the 2003 Annual Report were zinc electroplating wastewater, zinc wastewater sludge, and zinc electroplating process tank filters and filter cartridges.

Dave Amlin, the Vice President, is responsible for managing the wastes generated at this facility.

Inspection Summary:

We arrived unannounced on site at 11:30AM and asked for Dave Amlin. After finding Mr. Amlin in his office we explained the nature of our visit. Mr. Amlin explained to us that the facility has a closed loop alkaline zinc plating process. He also said that he evaporates as much of the wastewaters as possible using a new evaporator. They do conduct some on-site neutralization treatment of the wastewaters prior to evaporation. Mr. Amlin explained that the wastewaters are pH adjusted, put through a filter press, into a boil down tank to pull out the metal hydroxides, and then go through the evaporator. We proceeded out to the other bay which houses the plating lines.

**Site Tour**

There are two plating lines here. One is the barrel line and the other is the still (rack) line. The barrel line consists of a line of twelve tanks, while the still line consists of a line of fifteen tanks. There are two 1000 gallon dangerous waste tanks along side the barrel line. One tank is the "water tank" that contains the overflow from the rinse tanks when rinsed out and the water softener regeneration discharge. The other tank is used to neutralize (pH adjust) the wastewaters. The waters are moved from

**USEPA SF**



**1341241**

the first tank into the second for the neutralization process. During this process, the metal hydroxides fall out. The metal hydroxides portion is then put through a filter press and the sludge is put into drums. Once four drums have accumulated they are put into a large super sack for transport and disposal as a special waste sludge. The left over waters from the neutralization tank are put into the blow-down tank. These waters are recirculated from the blow-down tank into the evaporator until the salts start to plug up the evaporator. Then, the evaporator is cleaned out and that material and the blow-down tank are pumped out by PSC and shipped off for disposal.

We looked at the secondary containment berm and found that it is difficult to inspect because it has a plastic cover over it throughout the facility. One of the corner pieces was cracked. Mr. Amlin said it had been hit by one of the forklift drivers. He said that he has tried to repair the pieces, but it is difficult to get the mortar to hold. The berm sits right along the sides of the tanks and probably would not hold the contents of the largest tank if it were to rupture; however, there really isn't any room for improvements or moving the tanks around. Mr. Amlin said that he is in the process of constructing a new building and moving the business into that building, but it's currently held up on permits.

#### Hazardous Waste Storage Area

This area is in a different bay from the plating lines. There was a large box of dangerous waste filters and cartridges being managed as a satellite accumulation container. We explained the requirements of satellite accumulation with Mr. Amlin. He then said that he does not have any room in the other bay where the waste is generated to store the box. This box was not adequately labeled. We discussed how managing waste as satellite accumulation in a final accumulation area can be confusing, and that Mr. Amlin must be aware of his responsibilities with wastes in this area. There was no other dangerous waste in this area.

#### Paperwork Review/Debriefing

We then proceeded back to Mr. Amlin's office to conduct the paperwork review. We reviewed the contingency plan, manifests for 2002 and 2003 and the respective annual reports. There was no personnel training plan available. We discussed the requirement of a personnel training plan and the importance of documenting the safety meeting trainings when appropriate for his staff. There were no personnel training records for Mr. Amlin. We reviewed the weekly inspection logs for 2002 and 2003. There were no inspection logs for the remainder of 2002 after the 10/15/02 inspection. We reviewed the logs for the wastes treated on-site.

## COMPLIANCE PROBLEMS

*The following conditions identified during the inspection on February 5, 2004 were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the citation from the regulations, (2) the specific observations from the inspection that highlight the problem, and (3) the corrective measures needed to fix the problem and achieve compliance. On the last page(s) of this report is a 'Compliance Certificate' which again lists these compliance citations and directives in a table. That certificate also lists the deadlines for the corrective measures to be completed. The certificate explains how to complete the form and return it to the Department of Ecology.*

**1) WAC 173-303-200(1)(d) as referenced by 170(2): Containers of dangerous waste were not identified with the words "Hazardous Waste" or "Dangerous Waste" and/or the major risk(s) associated with the waste.**

The large box of dangerous waste cartridges in the waste accumulation area was not adequately labeled.

*Within two days of receipt of this letter, adequately label all drums containing dangerous waste in accordance with WAC 173-303-200(1)(d). Submit a photo to show compliance with this section.*

**2) WAC 173-303-330 as referenced by 200(1)(e): Training requirements were not met. The facility should have a training program, a written training plan, and keep training records.**

There was no personnel training plan available. There were no up-to-date training records for Dave Amlin available.

*Within 45 calendar days of the receipt of this letter, develop a dangerous waste training program which shall include a written training plan and records per WAC 173-303-330. Submit copies of the plan and the training records for Dave Amlin to show compliance with this section.*

**3) WAC 173-303-630(6) as referenced by 200(1)(b): Dangerous waste accumulation areas were not inspected weekly.**

There were no weekly inspection logs for the week of October 20, 2002 through December 31, 2002.

*Within 7 days of receipt of this letter, institute an inspection schedule that ensures these areas are inspected at least on a weekly basis. Submit copies of the missed inspection logs to show compliance with this section.*

**4) WAC 173-303-640(6)(b): Dangerous waste tank storage systems must be inspected daily per 640(6)(b), and the inspection should be documented with an inspection log per 640(6)(d).**

Daily tank inspections were not being documented.

*Within 7 days from receipt of this letter, develop an inspection log (or modify an existing one) to record dangerous waste tank inspections. The log shall include the date and time of the inspection, the signature of the inspector, a notation of the observations made and the date and nature of any corrective measures taken. The tank inspections must include all above ground and accessible portions of the system, including secondary containment, to detect corrosion, structure failures or releases, and record data gathered from monitoring equipment. Submit a copy of the inspection log and the daily inspections for February 15 – March 15, 2004 to show compliance with this section.*

## COMPLIANCE CERTIFICATE

**Instructions: Return this Completed Form or Request an Extension** -- Use this form to report if the action(s) needed to achieve compliance, identified during the inspection on **February 5, 2004**, have been completed. Complete the shaded portion of the table and mail a copy of this form to **Lisa Perle** by **April 22, 2004** at the following address: Washington Department of Ecology, Hazardous Waste and Toxics Reduction Program, Attention: **Lisa Perle, PO Box 47600, Olympia, WA 98504**.

An extension of the deadlines to achieve compliance may be requested. Please make a request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to **Lisa Perle** before the date specified above. Ecology will provide a written approval or denial of your request.

*If you have any questions about information in this Compliance Report, please call:*

**Lisa Perle at (360) 407.7553**

*The problems identified below must be corrected in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Please indicate the date each action is completed and initial each item. Include any comments explaining the actions taken on a separate piece of paper.*

**1) WAC 173-303-200(1)(d) as referenced by 170(2): Containers of dangerous waste were not identified with the words "Hazardous Waste" or "Dangerous Waste" and/or the major risk(s) associated with the waste.**

*Within two days of receipt of this letter, adequately label all drums containing dangerous waste in accordance with WAC 173-303-200(1)(d). Submit a photo to show compliance with this section.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-200(1)(d) as referenced by 170(2)	3/10/04		

**2) WAC 173-303-330 as referenced by 200(1)(e): Training requirements were not met. The facility should have a training program, a written training plan, and keep training records.**

*Within 45 calendar days of the receipt of this letter, develop a dangerous waste training program which shall include a written training plan and records per WAC 173-303-330. Submit copies of the plan and the training records for Dave Amlin to show compliance with this section.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-330 as referenced by 200(1)(e)	4/22/04		

**3) WAC 173-303-630(6) as referenced by 200(1)(b): Dangerous waste accumulation areas were not inspected weekly.**

*Within 7 days of receipt of this letter, institute an inspection schedule that ensures these areas are inspected at least on a weekly basis. Submit copies of the missed inspection logs to show compliance with this section.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-630(6) as referenced by 200(1)(b)	3/15/04		

**4) WAC 173-303-640(6)(b): Dangerous waste tank storage systems must be inspected daily per 640(6)(b), and the inspection should be documented with an inspection log per 640(6)(d).**

*Within 7 days from receipt of this letter, develop an inspection log (or modify an existing one) to record dangerous waste tank inspections. The log shall include the date and time of the inspection, the signature of the inspector, a notation of the observations made and the date and nature of any corrective measures taken. The tank inspections must include all above ground and accessible portions of the system, including secondary containment, to detect corrosion, structure failures or releases, and record data gathered from monitoring equipment. Submit a copy of the inspection log and the daily inspections for February 15 – April 15, 2004 to show compliance with this section.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-640(6)(b)	3/15/04		

The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, sex, marital status, disabled veteran's status, Vietnam Era veteran's status or sexual orientation. If you have special accommodation needs or require this document in alternative format, please contact Lisa Perle at 360.407.7553 (Voice) or use the Washington State Relay operator by dialing either 711 or 1-800-833-6388 (TTY).